

*Before the Federal Communications Commission
Washington, D.C. 20554*

In the Matter of:)	
)	
Advanced Television Services and)	MB Docket No. 87-268
Their Impact upon the Existing)	
Television Broadcast Service)	

Directed to: The Commission

COMMENTS AND REQUEST FOR ALTERNATIVE CHANNEL DESIGNATION

Evangelistic Alaska Missionary Fellowship, Inc. ("Evangelistic Alaska"), licensee of KJNP-TV and permittee of KJNP-DT, North Pole, Alaska, by its attorneys, hereby respectfully submits its Comments and Request for Alternative Channel Designation in response to the Commission's *Seventh Further Notice of Proposed Rule Making*, FCC 06-150, released October 20, 2006 ("*SFNPRM*"). With respect thereto, the following is stated:

1. KJNP-TV is licensed to operate on Channel 4, and it was initially assigned Channel 20 as its companion DTV channel. Pursuant to the *SFNPRM*, KJNP-DT was assigned Channel 4 as its Tentative Channel Designation ("TCD") for post-transition operation. In accordance with the procedures outlined in Paragraph 25 of the *SFNPRM*, however, in light of the status of KJNP-DT's TCD as a low-band VHF channel, Evangelistic Alaska is now seeking the designation of Channel 20 for KJNP-DT as set forth in the attached Engineering Statement. This alternative channel designation would serve the public interest by allowing KJNP-DT to provide improved service to the public.

2. The special circumstances of KJNP-TV have made the DTV transition particularly difficult for the station. KJNP-TV is a small, independent station located in Alaska, outside of

any of the major cities there. While KJNP-TV is licensed as a commercial television station and does air some advertising, it operates on a largely noncommercial basis with volunteer staff members. Thus, its financial resources are quite limited, and even at the time that it filed its Pre-Election Certification Form (FCC Form 381), File No. BCERCT-20041103AAY, Evangelistic Alaska was concerned as to precisely how it would be able to afford constructing the new DTV facility. As a result, KJNP-DT's application for an initial DTV construction permit had specified DTV facilities that would operate with low power. At the time of the Pre-Election Certification, the application for construction permit remained pending, and the digital facilities therefore were not operational. Likewise, at the time of the filing of the station's First Round Election, File No. BFRECT-20050208AEQ, which specified that the station would operate on Channel 4, its current analog channel, the construction permit application was still in pending status.

3. Thereafter, however, significant changes took place. The application for construction permit was granted on February 10, 2005, with an expiration date of August 10, 2006. As the station was beginning to make preparations for construction prior to the deadline, a higher-power transmitter than Evangelistic Alaska had anticipated using was made available to KJNP-DT at a reduced price. Consequently, the station sought and was granted Special Temporary Authority ("STA"), File No. BDSTA-20060214ADK, to operate with a power level greater than that specified in the construction permit, but within the original DTV allotment parameters for the station. The station began operations pursuant to the STA and followed with an application for modification of construction permit to specify the higher-powered facilities authorized by the

STA (File No. BMPCDT-20060609ABY), and that application remains pending.¹

4. In the interim, KJNP-DT has gained experience with the operation of the Channel 20 facilities authorized by the STA, experience which it had not been able to have prior to submission of the Pre-Election Certification or First Round Election. It has found that the facilities now in use provide adequate coverage to the station's community of license and thus has concluded that facilities on that channel with a similar power level and increased height above average terrain will be beneficial for post-transition operation. Evangelistic Alaska is also aware of the significant difficulties encountered by or projected for the operations of other DTV stations on Channel 4 and other low-band VHF channels. Accordingly, in light of the public interest benefits that have been realized through its current Channel 20 operation, Evangelistic Alaska is now seeking Channel 20 as an alternative TCD with the facilities specifications set forth in the attached Engineering Statement.

5. As demonstrated in the attached Engineering Statement, the proposed facilities comply with the Commission's technical rules and policies. While the station is located within the zone which requires Canadian concurrence, in light of the facts that Channel 20 was initially allotted for use by KJNP-DT, and that the facilities proposed are well within those specified at the time of the initial allotment, there should be no issue in this regard. Furthermore, as indicated in the Engineering Statement, no portion of the station's interfering contour will enter Canadian territory.

WHEREFORE, the premises considered, Evangelistic Alaska respectfully requests that

¹ Applications for extension of both the STA and the construction permit have been filed since that time, File No. BEDSTA-20060630AAR and File No. BEPCDT-20060809AHN, and also remain pending.

KJNP-DT be assigned Channel 20 as its TCD in accordance with the attached Engineering Statement.

Respectfully submitted,

EVANGELISTIC ALASKA MISSIONARY
FELLOWSHIP, INC.

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January 11, 2007